# UNITED STATES DISTRICT COURT WESTERN DISTRICT OF LOUISIANA MONROE DIVISION

BENJAMIN CRAIG, Individually and on )	Civil Action No. 3:17-cv-01005-RGJ-JPM
Behalf of All Others Similarly Situated,	CLASS ACTION
Plaintiff,	<u>CLASS RETION</u>
vs. )	
CENTURYLINK, INC., et al.,	
Defendants. )	
DON J. SCOTT, Individually and on Behalf of ) All Others Similarly Situated,	Civil Action No. 3:17-cv-01033-RGJ-JPM  CLASS ACTION
Plaintiff, )	CLASS ACTION
vs.	
CENTURYLINK, INC., et al.,	
Defendants. )	

[Caption continued on following page.]

NOTICE OF CONSENT TO MOTION FOR CONSOLIDATION

AMARENDRA THUMMETI, Individually	) Civil Action No. 3:17-cv-01065-RGJ-JPM
and on Behalf of All Others Similarly Situated,	
DI : .: 60	) <u>CLASS ACTION</u>
Plaintiff,	
VS.	)
CENTURYLINK, INC., et al.,	) )
Defendants.	) )

On August 21, 2017, Amalgamated Bank, as Trustee for the LongView Collective

Investment Fund (the "Investment Fund") filed a motion for consolidation of three Related Actions:

(1) Thummeti v. CenturyLink, Inc., et al., No. 3:17-cv-01065-RGJ-JPM (filed June 21, 2017 in

S.D.N.Y. and transferred to W.D. La. on August 16, 2017); (2) Craig v. CenturyLink, Inc., et al., No.

3:17-cv-01005-RGJ-JPM (filed June 22, 2017 in S.D.N.Y. and transferred to W.D. La. on August 8,

2017); and (3) Scott v. CenturyLink, Inc., et al., No. 3:17-cv-01033-RGJ-JPM (filed August 15, 2017)

in W.D. La.). Dkt. No. 29. Five other lead plaintiff movants also sought consolidation of the

Related Actions on August 21, 2017. See Dkt. Nos. 21, 24, 25, 26, and 28. On August 23, 2017,

counsel for the Investment Fund contacted counsel for defendants to determine defendants' position

on the Investment Fund's motion for consolidation. Defense counsel communicated that defendants

consent to the consolidation of the Related Actions.

In the same motion, the Investment Fund also sought to have the Investment Fund appointed

as lead plaintiff and to have its selection of lead counsel approved under the Private Securities

Litigation Reform Act of 1995. See Dkt. No. 29. This notice of consent involves only the motion to

consolidate the Related Actions and does not pertain in any way to the portions of the motion

relating to appointment of lead plaintiff and lead counsel.

DATED: August 23, 2017

LEMMON LAW FIRM, LLC ANDREW A. LEMMON (#18302)

s/ ANDREW A. LEMMON

ANDREW A. LEMMON

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Local Counsel for Plaintiff

- 1 -

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[Proposed] Lead Counsel for Plaintiff

# **CERTIFICATE OF SERVICE**

I hereby certify that on August 23, 2017, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I caused to be mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on August 23, 2017.

s/ ANDREW A. LEMMON ANDREW A. LEMMON

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# Mailing Information for a Case 3:17-cv-01005-RGJ-JPM Craig v. CenturyLink Inc et al

#### **Electronic Mail Notice List**

The following are those who are currently on the list to receive e-mail notices for this case.

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## Manual Notice List

The following is the list of attorneys who are not on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

• (No manual recipients)